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MEMO ENDORSED

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December 21, 2020

VIA ECF

Honorable Denise L. Cote
United States District Court
Southern District of New York
500 Pearl Street, Room 1910
New York, New York 10007

The motion to seal is granted.
12.22.2020.


DENISE COTE
United States District Judge

Re: *TransPerfect Global, Inc. v. Lionbridge Technologies, Inc., et al.*,
Case No. 1:19-cv-3283-DLC

Dear Judge Cote:

Defendants respectfully request authorization to file under seal Exhibits 1–3 and file in redacted form Exhibit 6 attached to the Declaration of Aaron Marks in Support of Defendants’ Opposition to Plaintiff’s Motion for Leave to Amend.

Exhibits 1 through 3 were produced by third parties in response to subpoenas and designated Confidential or Highly Confidential by those third parties under the Court’s June 3, 2020 Stipulation and Order Regarding Confidential Discovery Material (the “Confidentiality Order”) (ECF No. 78).

Exhibit 6 is an email from counsel for TransPerfect identifying the two TransPerfect clients referenced by its counsel during the December 15, 2020 hearing before this Court. Defendants lack sufficient information to determine whether TransPerfect believes such information should be designated Confidential or Highly Confidential under the Confidentiality Order. Concurrently with the filing of this letter, Defendants have inquired with counsel for TransPerfect as to whether it intends to designate this information under the Confidentiality Order. Exhibit 6 is submitted redacting the names of the two TransPerfect clients awaiting counsel’s response.

In order to address Plaintiff’s Motion for Leave to Amend, we must reference these documents. Pursuant to Your Honor’s Individual Practices, we have enclosed full, unredacted versions of the Exhibits. We have also provided Plaintiff with the unredacted materials.

We thank the Court for its consideration of this request.

KIRKLAND & ELLIS LLP

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Respectfully submitted,

/s/ Aaron Marks

Aaron Marks, P.C.

cc: All Counsel of Record (via ECF)